

BURRIS, NISENBAUM, CURRY & LACY LLP

JOHN L. BURRIS, Esq. (SBN 69888)

Airport Corporate Centre

7677 Oakport Street, Suite 1120

Oakland, California 94621

Telephone: (510) 839-5200

Facsimile: (510) 839-3882

john.burris@johnburrislaw.com

BURRIS, NISENBAUM, CURRY & LACY LLP

DEWITT M. LACY, Esq. (SBN 258789)

JULIA N. QUESADA, Esq. (SBN 337872)

LENA P. ANDREWS, Esq. (SBN 342471)

9701 Wilshire Blvd., Suite 1000

Beverly Hills, California 90212

Telephone: (310) 601-7070

Facsimile: (510) 839-3882

dewitt@bncllaw.com

julia.quesada@bncllaw.com

lena.andrews@bncllaw.com

Attorneys for Plaintiff

Antonio Lopez, Johanna Lopez, & S.L. by and through his guardian ad litem

Rocio Flores

**UNITED STATE DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ANTONIO LOPEZ, individually;
JOHANNA LOPEZ, individually;
M.R., by and through his guardian ad
litem, April Rodriguez, individually
and as successor in interest to
Brandon Lopez; B.L. and J.L., by and
through their guardian ad litem
Rachel Perez, individually and as
successors in interest to Brandon
Lopez; S.L., by and through his
guardian ad litem, Rocio Flores,
individually and as successor in
interest to Brandon Lopez,

Plaintiff,

vs.

Case No.: 8:22-cv-01351-JVS-ADS

*(Honorable James V. Selna; Magistrate
Judge Autumn D. Spaeth)*

**PLAINTIFFS' ADMINISTRATIVE
APPLICATION TO FILE BODY
WORN CAMERA MARKED
CONFIDENTIAL BY FORMER
DEFENDANT CITY OF SANTA
ANA IN SUPPORT OF THEIR
OPPOSITION TO DEFENDANTS'
MOTION FOR SUMMARY
JUDGMENT UNDER SEAL**

Case No. 2:22-cv-07651-JLS-KS

**PLAINTIFFS' ADMINISTRATIVE APPLICATION TO FILE BODY WORN CAMERA MARKED
CONFIDENTIAL BY FORMER DEFENDANT CITY OF SANTA ANA IN SUPPORT OF THEIR
OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT UNDER SEAL**

CITY OF ANAHEIM, a municipal corporation; CITY OF SANTA ANA, a municipal corporation; DAVID VALENTIN, individually and in his official capacity as the Chief of Police for the CITY OF SANTA ANA Police Department; JORGE CISNEROS, individually and in his official capacity as the Chief of Police for the CITY OF ANAHEIM Police Department; PAUL DELGADO, individually and in his official capacity as an officer for the CITY OF ANAHEIM Police Department; BRETT HEITMAN; KENNETH WEBER, individually and in his official capacity as an officer for the CITY OF ANAHEIM Police Department; BRETT HEITMAN; CAITLIN PANOV, individually and in her official capacity as an officer for the CITY OF ANAHEIM Police Department; BRETT HEITMAN, individually and in his official capacity as an officer for the CITY OF ANAHEIM Police Department; BRETT HEITMAN; DOES 1-10, individually and in their official capacity as law enforcement officers for the CITY OF ANAHEIM Police Department and CITY OF SANTA ANA Police Department,

Defendants.

Pursuant to Local Rule 79-5.2.2, Plaintiffs ANTONIO LOPEZ (hereinafter “Mr. Lopez”) and JOHANNA LOPEZ (hereinafter “Ms. Lopez”) (“Plaintiffs”) hereby submit their Administrative Application to File Exhibits Marked Confidential by Defendants in Support of Their Opposition to Defendants’ Motion for Summary Judgment Under Seal. The full documents, attached as Exhibits to the Declaration of Lena P. Andrews in Support of Plaintiffs’ Administrative Application to File Exhibits in Support of Their Opposition to Defendants’ Motion for Summary Judgment Under Seal, are proposed to be filed under seal.

Pursuant to Local Rule 79-5.2.2(b), Plaintiffs make this application on the grounds that: Plaintiffs rely on the Body Worn Camera Video of SAPD Officer Arias (Exhibit L) in support of their Opposition to Defendants Motion for Summary Judgment. Exhibit L was produced and marked confidential by former Defendant City of Santa Ana, who is no longer a party to this action.

The parties met and conferred via email on July 22, 2024, regarding the video. The parties were unable to reach an agreement regarding whether the document could be filed publicly.

Accordingly, Plaintiffs respectfully request this Court enter an order permitting the Body Worn Camera Video of SAPD Officer Arias (Exhibit L), to be filed under seal in support of Plaintiff's Opposition to Defendants' Motion for Summary Judgment. In the alternative, Plaintiffs respectfully request this Court deny this application and enter an Order permitting Plaintiffs to file the Body Worn Camera Video of SAPD Officer Arias (Exhibit L) publicly.

Dated: July 22, 2024

BURRIS, NISENBAUM, CURRY & LACY LLP

By: /s/ Lena Andrews

DeWITT M. LACY

JOHN L. BURRIS

JULIA N. QUESADA

LENA P. ANDREWS

Attorneys for Plaintiffs Antonio
 Lopez, Johanna Lopez, & S.L. by
 and through his guardian ad litem
 Rocio Flores